

REMARKS

In view of the following remarks, Applicants respectfully request reconsideration and allowance of the subject application. Claims 1, 2, 3, 27, 28, 39, and 48 are currently amended. Claim 41 is currently canceled. The remaining claims are as originally filed. Thus, claims 1-40 and 42-81 are pending.

Rejections

Claims 1-3, 27-28, and 48 stand rejected under 35 U.S.C. §112, second paragraph, as being indefinite. Claims 1-2 and 27 stand rejected under 35 U.S.C. §102 as being anticipated by Hawley et al., U.S. Patent No. 6,192,367 ("Hawley"). Claims 3-26 and 28-81 stand rejected as being unpatentable over Hawley in view of U.S. Patent Application Pub. No. 2003/0025732 A1 to Prichard ("Prichard").

Applicants amend claims 1-2, 27, and 48 to address the Office's rejections under 112.

To expedite prosecution, but without agreeing to the validity of the Office's rejections under 102 or 103, Applicants amend independent Claims 27 and 39.

Applicants also submit that the Office has failed to establish a *prima facie* case of anticipation and/or obviousness with respect to independent Claims 1, 29, 42, 48, 76, and 79 and respectfully traverses the Office's rejections of these claims.

Response to Rejections

Independent Claims 1 and 27, which are currently amended, recite: “a unique name that is the same as a name computed from a solution identifier in the data file and enables discovery and deployment of the solution when the data file is opened”. The Office relies on Hawley at Figure 3 and Col. 4, lines 29-50 in rejecting Claim 1 as anticipated under 102. This portion of Hawley, however, discloses “a copy file selection window 302 that can be used to open a file with data file structure information.” Hawley discloses that, through this window, a user may open a data file with the data file’s name, path, or responsive to the user’s search. But no where does Hawley disclose a unique name that is the same as a name computed from a solution identifier in the data file that enables discovery and deployment of a solution as required by Claim 1 and amended Claim 27. For at least this reason, Applicant submits that independent Claims 1 and 27 are allowable over Hawley.

Claims 2-26 and 28 depend from independent Claims 1 and 27, respectively. Each is allowable by virtue of its dependency on respective base claims, as well as the additional elements each recites. The Office’s basis for rejecting Claims 3-26 and 28 under 103 do not provide the deficiencies in the outstanding rejection of independent Claims 1 and 27 on which they respectively depend. Accordingly, Applicants respectfully request that the Office allow Claims 1-28.

Independent Claim 29 recites: “a markup-language schema ... wherein fragments of the markup-language schema are coupled with portions of the markup-

language document” and “a presentation application which ... transforms the coupled portions of the markup-language document into an electronic form.” In its rejection of independent Claim 29 under 103, the Office makes no mention whatsoever of “fragments” that are “coupled with portions” of a markup language document. Nor does the Office make any mention of a presentation application that “transforms the coupled portions.” For at least this reason, the Office fails to establish a *prima facie* case of obviousness in rejecting Claim 29. Applicants are under no obligation to establish patentability of a claim if the Office has not first established a *prima facie* case in rejecting that claim.

Claims 30-38 depend from independent Claim 29. Each is allowable by virtue of its dependency on an allowable base claim, as well as the additional elements each recites. The Office’s basis for rejecting Claims 30-38 under 103 do not provide the deficiencies in the outstanding rejection of independent Claim 29 on which they depend. Accordingly, Applicants respectfully request that the Office allow Claims 29-38.

Independent Claim 39, which is currently amended, recites: “a unique name that is the same as a name computed from a solution identifier in the markup-language document and enables discovery and deployment of the solution” and “a presentation application which, when executed responsive to being discovered using the unique name, transforms the pieces of markup-language data into an electronic form according to the structure of the corresponding said portions”. As noted above in

regard to independent Claims 1 and 27, Hawley does not teach or disclose a unique name that is the same as a name computed from a solution identifier. As the Office has not established that any portion of Prichard has provided for this deficiency in Hawley, Applicants submit that independent Claim 39 is allowable over Hawley in view of Prichard.

Claim 40 depends from independent Claim 39. It is allowable by virtue of its dependency on an allowable base claim, as well as additional elements it recites. The Office's basis for rejecting Claim 40 does not provide the deficiencies in the outstanding rejection of independent Claim 39. Accordingly, Applicants respectfully request that the Office allow Claims 39-40.

Regarding independent Claim 42, the Office fails to establish a *prima facie* case of obviousness for reasons similar to those given with regard to independent Claim 29. For at least this reason Applicant submits that independent Claim 42 is allowable over the art of record.

Claims 43-47 depend from independent Claim 42 and are allowable by virtue of their dependency on this allowable base claim as well as additional elements each recites. The Office's basis for rejecting Claims 43-47 does not provide the deficiencies in the outstanding rejection of independent Claim 42 on which they depend. Accordingly, Applicants respectfully request that the Office allow Claims 42-47.

Independent Claim 48, currently amended, recites: “receiving an instruction to open a markup-language document having a structure and a solution identifier”, “computing a unique name using the solution identifier”, and “discovering a solution using the unique name”. In the Office’s rejection, the Office refers back to the basis it used in rejecting Claims 1, 2, and 27. This basis, namely Hawley at Figure 3 and Col. 4, lines 29-50, does not teach or disclose a unique name as recited in Claim 48. Specifically, Hawley does not teach or disclose “computing a unique name” using a “solution identifier”. Nor does the Office show how Prichard supplies this deficiency of Hawley. For at least this reason, Applicant submits that independent Claim 48 is allowable over the art of record.

Claims 49-75 depend from independent Claim 48 and are allowable by virtue of their dependency on this allowable base claim as well as additional elements each recites. The Office’s basis for rejecting Claims 49-75 does not provide the deficiencies in the outstanding rejection of independent Claim 48 on which they depend. Accordingly, Applicants respectfully request that the Office allow Claims 48-75.

Independent Claims 76 and 79 recite, respectively: “fragments of the markup-language schema are coupled with portions of the markup-language document” and “portions of the markup-language document are logically coupled with fragments of the markup-language schema”. As noted with regard to the rejection of independent Claim 29 above, the Office similarly fails to establish a *prima facie* case establishing

that these elements of Claims 76 and 79 are taught or disclosed by the combination of Hawley and Prichard.

Claims 77-78 and 80-81 depend from independent Claims 76 and 79, respectively. Each is allowable by virtue of its dependency on its respective base claim, as well as the additional elements each recites. The Office's basis for rejecting Claims 77-78 and 80-81 under 103 do not provide the deficiencies in the outstanding rejection of independent Claims 76 and 79. Accordingly, Applicants respectfully request that the Office allow Claims 76-81.

Conclusion

Applicants submit that the pending claims are in condition for allowance and respectfully requests that this application be allowed and forwarded on to issuance. If any issues remain that prevent allowance, Applicants request that the Office contact the undersigned attorney to address these issues through an interview.

Respectfully Submitted,

Date: _____

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By: _____

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